

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

UNITED STATES POSTAL SERVICE
INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO
THE OFFICE OF THE CONSUMER ADVOCATE WITNESS SMITH
(USPS/OCA-T6-9-11)

Pursuant to rules 25 and 26 of the Rules of Practice and Procedure and rule 2 of the Special Rules of Practice, the United States Postal Service directs the following interrogatories and requests for production of documents to the Office of the Consumer Advocate witness Smith: USPS/OCA-T6-9-11.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


Eric P. Koetting

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January 23, 1998

POSTAL SERVICE INTERROGATORIES FOR OCA WITNESS SMITH

USPS/OCA-T600-9. Please refer to your testimony at pages 26-28.


- (a) Please provide a mathematical regression equation that corresponds to the "pooled model" as you use the term in your testimony.
- (b) Please confirm that the pooled model is a special case of the "fixed-effects model" in which all of the intercepts are constrained to be equal.

USPS/OCA-T600-10. Please refer to your testimony at page 27. You state that since you have not computed regressions, your conclusions are "not precise." Given that you have had access to the required data, why did you choose not to compute the regressions that would have made your conclusions "precise"? Please explain fully.

USPS/OCA-T600-11. Please refer to your testimony at page 27, lines 4-6. Please explain precisely what you mean by your statement "the underlying data plotted on a site by site basis substantiate both fixed effects regressions and pooled regressions."

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

A handwritten signature in cursive script, appearing to read "Eric P. Koetting", written over a horizontal line.

Eric P. Koetting

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